UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

OCT 0 4 2012

SP5 Wood Alta Stone Place, LLC
Attn: Mr. Mark Theriault
80 Hayden Avenue, Suite 120
Lexington, Massachusetts 02421

Re: PCB Risk-Based Disposal Approval under 40 CFR § 761.61(c)
72-78 Stone Place and 99R and 101R Washington Street
Melrose, Massachusetts
MassDEP RTN: 3-30060

Dear Mr. Theriault:

This is in response to the Notification[1] by SP5 Wood Alta Stone Place, LLC for approval of a PCB risk-based disposal plan under § 761.61(c) to address PCB contamination on the property located at 72-78 Stone Place, and 99R and 101R Washington Street in Melrose, Massachusetts. Specifically, PCB concentrations at the property exceed the PCB level for unrestricted use under the federal PCB regulations at 40 CFR § 761.61(a) in the following areas (hereinafter, "the Site"):

- ⇨ The interior and crawl spaces of Building C
- ⇨ The breezeway concrete of Building C
- ⇨ 99R and 101R Washington Street building slab remnants
- ⇨ The concrete-floored and stone mortar-walled culvert

SP5 Wood Alta Stone Place, LLC's proposed a risk-based disposal plan to address the PCB contamination that includes the following activities:

- Remove and dispose of non-structural wooden flooring throughout interior Area C as a greater than or equal to (≥) 50 parts per million (ppm) PCB waste in accordance with § 761.61(b);

---

1 Information was submitted by VERTEX Environmental Services, Inc. (VERTEX) on behalf of SP5 Wood Alta Stone Place, LLC to support a risk-based disposal approach for *PCB remediation waste* under 40 CFR § 761.61(c). Information was provided dated March 12, 2012 (PCB Investigation Data report); May 18, 2012 (PCB Risk-Based Remedial Action Plan (RAP)); September 10, 2012 (Response to EPA Comments); and October 4, 2012 (email Sample Summary Table and RAP modifications). These submissions will be referred to as the "Notification."

- Conduct additional sampling as described in the Notification of all areas to confirm disposal requirements of the PCB-contaminated materials or to confirm that no further remedial action is necessary;

- Remove *PCB remediation waste* (e.g., soils, debris, *porous surfaces*, such as concrete and masonry) with greater than (>) 1 ppm PCBs and dispose as a less than (<) 50 ppm or ≥ 50 ppm PCB waste in accordance with § 761.61(a)(5)(i)(B)(*2*)(*ii*) and § 761.61(a)(5)(i)(B)(*2*)(*iii*);

- Install a compliant cap over PCB-contaminated soils and/or concrete remaining at the Site with PCB concentrations > 1 ppm but < 10 ppm in accordance with 761.61(a)(7), if the less than or equal to (≤) 1 ppm PCB cleanup standard cannot be achieved; and,

- Record a deed restriction to document that PCBs at > 1 ppm remain at the Site.

SP5 Wood Alta Stone Place, LLC has concluded that soils and groundwater located in the following locations of the property do not contain PCBs at concentrations which require cleanup or response action under the PCB regulations at 40 CFR Part 761 or under the Massachusetts Department of Environmental Protection (MassDEP) regulations:

- Stone Place Road
- Area to the north of Stone Place Road
- 99R and 101R Washington Street (with exception of the former building concrete slabs)

The information provided meets the notification requirements under § 761.61(a)(3) and § 761.61(c). With the exception of the verification sampling requirements under § 761.61(a)(6), given the results of the initial sampling and the proposed additional characterization and/or confirmatory sampling, EPA has determined that this alternative sampling will not result in an unreasonable risk to public health or the environment.

SP5 Wood Alta Stone Place, LLC may proceed with its project in accordance with 40 CFR § 761.61(c); its Notification; and, this Approval, subject to the conditions of Attachment 1. This Approval may be revoked, suspended and/or modified as described in Attachment 1, or if the EPA determines that implementation of this Approval may present an unreasonable risk of injury to health or the environment, or if there is a change in the proposed Site use.

Nothing in this Approval is intended or is to be construed to prejudice any right or remedy concerning PCBs or other federally-regulated contaminants at the Site otherwise available to the EPA under Section 6 of TSCA, 15 U.S.C. 2605, 40 CFR Part 761, or other provisions of federal law.

This Approval does not release SP5 Wood Alta Stone Place, LLC from any applicable requirements of federal, state or local law, including the requirements related to cleanup and disposal of PCBs or other contaminants under the Massachusetts Department of Environmental Protection (MassDEP) regulations.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall consider this project complete only when it has received documents required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

Nancy Barmakian for

James T. Owens III, Director
Office of Site Remediation & Restoration

Attachment 1: Approval Conditions
Attachment 2: Sample Summary Table

cc: J. Frieden, VERTEX
MassDEP RTN: 3-30060
File

ATTACHMENT 1:

PCB RISK-BASED DISPOSAL APPROVAL CONDITIONS
SP5 WOOD ALTA STONE PLACE, LLC
72-78 STONE PLACE AND 99R AND 101R WASHINGTON STREET (the "Site")
MELROSE, MASSACHUSETTS

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to *PCB remediation waste* identified in the Notification[2] and located at the Site.

    a. In the event that SP5 Wood Alta Stone Place, LLC identifies other PCB-contaminated wastes (PCBs not identified in the Notification) subject to cleanup and disposal under the PCB regulations, SP5 Wood Alta Stone Place, LLC will be required to notify EPA and clean up the PCB-contaminated wastes in accordance with 40 CFR Part 761.

    b. SP5 Wood Alta Stone Place, LLC may submit a separate plan to address the PCB contamination or may modify the Notification to incorporate cleanup of the PCBs under this Approval in accordance with Condition 19.

2. SP5 Wood Alta Stone Place, LLC shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.

3. In the event that the activities described in the Notification differ from the conditions specified in this Approval, the conditions of this Approval shall govern.

4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.

5. SP5 Wood Alta Stone Place, LLC must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during remedial activities, SP5 Wood Alta Stone Place, LLC shall contact EPA within twenty-four (24) hours for direction on sampling and cleanup requirements.

[2] Information was submitted by VERTEX Environmental Services, Inc. (VERTEX) on behalf of SP5 Wood Alta Stone Place, LLC to support a risk-based disposal approach for *PCB remediation waste* under 40 CFR § 761.61(c). Information was provided dated March 12, 2012 (PCB Investigation Data report) and May 18, 2012 (PCB Risk-Based Remedial Action Plan (RAP)); September 10, 2012 (Response to EPA Comments); and October 4, 2012 (email Sample Summary Table and RAP modifications). These submissions will be referred to as the "Notification."

6. SP5 Wood Alta Stone Place, LLC is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time SP5 Wood Alta Stone Place, LLC has or receives information indicating that SP5 Wood Alta Stone Place, LLC or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within twenty-four (24) hours of having or receiving the information.

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by SP5 Wood Alta Stone Place, LLC are authorized to conduct the activities set forth in the Notification. SP5 Wood Alta Stone Place, LLC is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the SP5 Wood Alta Stone Place, LLC from compliance with any applicable requirements of federal, state or local law; or 3) release the SP5 Wood Alta Stone Place, LLC from liability for, or otherwise resolve, any violations of federal, state or local law.

9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from SP5 Wood Alta Stone Place, LLC of its acceptance of the conditions of this Approval within ten (10) business days of receipt.

11. SP5 Wood Alta Stone Place, LLC shall notify EPA in writing of the scheduled date of commencement of on-site activities at least one (1) business day prior to conducting any work under this Approval.

12. Prior to initiating onsite work authorized under this Approval, SP5 Wood Alta Stone Place, LLC shall submit the following information for EPA review and/or approval:

    a. a certification signed by its selected contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval; and,

    b. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the analytical and quality assurance requirements specified in the Notification and in this Approval.

REMEDIAL AND DISPOSAL CONDITIONS

13. To the maximum extent practical, engineering controls shall be utilized to minimize the potential for PCB releases during the remedial activities. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

14. The cleanup level for *PCB remediation waste* at the Site shall be less than or equal to (≤) 1 part per million (ppm).

    a. *Bulk PCB remediation waste* samples (e.g., soil, debris) shall be collected on a bulk basis (e.g., mg/Kg) and in accordance with the frequency detailed in the Notification (see Attachment 2). Samples shall be collected from both excavation bottoms and sidewalls, as applicable.

    b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 for solid matrices; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.

15. The decontamination standard for *porous surfaces* (e.g., concrete, brick, wood) shall be ≤ 1 ppm.

    a. Sampling of *porous surfaces* shall be performed on a bulk basis (i.e., mg/kg) and reported on a dry weight analysis. Sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches and with the sampling frequency detailed in the Notification (see Attachment 2).

    b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 for solid matrices; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.

16. The decontamination standard for *non-porous surfaces* (e.g., metal surfaces) shall be less than (<) 1 µg/100 cm^2 for accessible surfaces and ≤ 10 µg/100 cm^2 for inaccessible surfaces.

    a. Wipe sampling of *non-porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. µg/100 cm^2) and at the frequency described in the Notification.

b. Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.

17. Following completion of work authorized under this Approval, indoor air sampling shall be conducted to determine the effectiveness of the containment and remedial activities:

a. *Indoor Air Sampling*

i) Indoor air sampling shall be conducted in accordance with EPA Method TO-4A or TO-10A. Sufficient sample volumes shall be collected to provide a minimum laboratory reporting limit of $< 0.02\ \mu g/m^3$ for total PCBs. At a minimum, PCB analysis shall include PCB homologues and/or PCB congeners.

ii) In the event that PCB air sample results are greater than (>) $0.02\ \mu g/m^3$, SP5 Wood Alta Stone Place, LLC shall contact EPA for further discussion on indoor air requirements and/or alternatives.

18. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with § 761.40; stored in a manner prescribed in § 761.65; and, disposed of in accordance with 40 CFR § 761.61, unless otherwise specified below:

a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6) and § 761.61(a)(5)(v).

b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).

c. PCB-contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

19. Any modification(s) in the plan, specifications, and information submitted by SP5 Wood Alta Stone Place, LLC, contained in the Notification, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. SP5 Wood Alta Stone Place, LLC shall inform the EPA of any modification, in writing, at least ten (10) days prior to such change. No action may be taken to implement any such

modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification.

If such modification involves a change in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from SP5 Wood Alta Stone Place, LLC to make a determination regarding potential risk.

20. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

21. Any misrepresentation or omission of any material fact in the Notification or in any future records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

22. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; if EPA finds that these activities present an unreasonable risk to public health or the environment; if EPA finds that there is migration of PCBs from the Site; or if EPA finds that changes are necessary to comply with new rules, standards, or guidance for such approvals. SP5 Wood Alta Stone Place, LLC may apply for appropriate modifications in the event new rules, standards, or guidance comes into effect.

23. SP5 Wood Alta Stone Place, LLC shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by SP5 Wood Alta Stone Place, LLC to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

RECORDKEEPING AND REPORTING CONDITIONS

24. SP5 Wood Alta Stone Place, LLC shall prepare and maintain all records and documents required by 40 CFR Part 761, including, but not limited to, the records required by Subparts J and K. SP5 Wood Alta Stone Place, LLC shall maintain a written record of the cleanup and the analytical sampling for activities conducted under this Approval. All records shall be made available for inspection by authorized representatives of the EPA, until such time as EPA approves in writing a request for an alternative disposition of such records.

25. SP5 Wood Alta Stone Place, LLC shall submit a Final Completion Report (Report) to the EPA within 120 days of completion of the activities described under this Approval. At a minimum, this Report shall include: a discussion of the project activities; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCBs removed and disposed off-site; copies of manifests; and, copies of certificates of disposal or similar certifications issued by the disposer, if applicable. The Report shall also include a certification signed by a SP5 Wood Alta Stone Place, LLC official verifying that the authorized activities have been implemented in accordance with this Approval and the Notification.

26. Within 60 days of completion of the cleanup activities described in the Notification and authorized by this Approval, and as required under §761.61(a)(8)(i)(B), SP5 Wood Alta Stone Place, LLC shall submit to EPA a certification, signed by an approving official, that it has recorded the notation on the deed as required under §761.61(a)(8)(i)(A). A copy of the notation on the deed must also be submitted.

    a. In the event that SP5 Wood Alta Stone Place, LLC is able to achieve a PCB cleanup standard of $\leq$ 1 ppm throughout the Site, the deed notice and certification requirements shall not apply.

27. Required submittals shall be mailed to:

    Kimberly N. Tisa, PCB Coordinator
    United States Environmental Protection Agency
    5 Post Office Square, Suite 100
    Mail Code: OSRR07-2
    Boston, Massachusetts 02109-3912

28. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self disclosure or penalty policies.

****

END OF ATTACHMENT 1

Attachment 2.

Attachment 1
Sample Summary Table
PCB Risk-Based Remedial Action Plan
72-78 Stone Place, 99R and 101R Washington Street
Melrose, Massachusetts

Location	Media	Estimated Quantity	Pre-Remedial Characterization	Disposal Characterization	Post-Remediation Confirmatory Sampling
Building C – Interior					
Floors (planking)	Wood	104,000 square ft	Samples: 5 point composite Frequency: Every 500 square ft Composite Action Limit: 0.20 mg/kg Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Walls	Brick	9,960 linear ft	Samples: 2 point composite Frequency: Every 60 linear ft (0-3' only) Composite Action Limit: 0.5 mg/kg Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Windows	Wood	492 windows	Samples: Discrete grab Frequency: 1 discrete every other windows Composite Action Limit: 1 mg/kg Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Beams	Wood	5,276 linear ft	Samples: Discrete grab (underside of beam) Frequency: 1 Every 50 linear ft Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Columns	Wood	227 columns	Samples: 3 point composite Frequency: 1 composite per every 3 columns (0-3' only) Composite Action Limit: 0.33 mg/kg Cleanup Goal: ≤ 1 mg/kg (Note: discrete sample shall be collected from each beam located adjacent to concrete slab with sample biased towards slab or staining)	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)

Attachment 1
Sample Summary Table
PCB Risk-Based Remedial Action Plan
72-78 Stone Place, 99R and 101R Washington Street
Melrose, Massachusetts

Location	Media	Estimated Quantity	Pre-Remedial Characterization	Disposal Characterization	Post-Remediation Confirmatory Sampling
Trusses	Wood	6,000 linear ft	Samples: Discrete grab (underside of truss) Frequency: 1 Sample Every 50 linear ft Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Slabs (top surface)	Concrete	14 pads	Samples: Discrete grab Frequency: Every 50 square ft (min. 1 per pad) Discrete Action Limit: 1 mg/kg Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Indoor air	Air	4 Floors	None	None	Samples: Indoor air discrete Frequency: 7 per floor Project Action Limit: 20 ng/m^3 Cleanup Goal: 20 ng/m^3
Building C – Crawlspaces					
Floors (West)	Soil	18,000 square ft	None (Previous sampling sufficient for disposal)	None (Previous sampling sufficient for disposal) Disposal based on PCB concentrations and other COC characterization	*After removal of top 3 inches:* Samples: 5 point composite Frequency: Every 500 square ft Composite Action Limit: 0.20 mg/kg Cleanup Goal: ≤ 1 mg/kg

Attachment 1
Sample Summary Table
PCB Risk-Based Remedial Action Plan
72-78 Stone Place, 99R and 101R Washington Street
Melrose, Massachusetts

Location	Media	Estimated Quantity	Pre-Remedial Characterization	Disposal Characterization	Post-Remediation Confirmatory Sampling
Floors (East)	Soil	8,000 square ft	None	Samples: 5 Discrete grab Frequency: 5 samples total (top 3 inches) Disposal based on PCB concentrations and other COC characterization	*After removal of top 3 inches:* Samples: 5 point composite Frequency: Every 500 square ft Composite Action Limit: 0.20 mg/kg Cleanup Goal: ≤ 1 mg/kg
Walls	Brick	2,184 linear ft	Samples: Discrete grab Frequency: Every 30 linear ft from bottom 3 feet (biased towards discoloration or staining) Project Action Limit: 1 mg/kg Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Beams	Wood	2,380 linear ft	Samples: Discrete grab (underside of beam) Frequency: Every 20 linear ft (biased towards staining) Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Columns	Wood	500 linear feet	Samples: Discrete grab Frequency: 1 per 20 linear feet (biased towards staining) Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Slab foundations	Concrete	14 foundations	Samples: Discrete grab Frequency: 1 per surface (i.e., 4 each per foundation) Discrete Action Limit: 0.20 mg/kg Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)

Attachment 1
Sample Summary Table
PCB Risk-Based Remedial Action Plan
72-78 Stone Place, 99R and 101R Washington Street
Melrose, Massachusetts

Location	Media	Estimated Quantity	Pre-Remedial Characterization	Disposal Characterization	Post-Remediation Confirmatory Sampling
Standing water	Liquid	To be determined	Samples: Discrete grab Frequency: 1 per 400 square ft Project Action Limit: 0.5 ug/L	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Breezeway					
Breezeway Slab	Concrete	3,200 square ft	Use existing data	Use existing data and dispose of as greater than 50 mg/kg PCBs	*After removal of a minimum of top 6 inches:* Samples: 5 point composite Frequency: Every 500 square ft Project Action Limit: 0.20 mg/kg Cleanup Goal: ≤ 1 mg/kg
99R and 101R Washington Street Slab (Area D)					
Area D Slab (north half)	Concrete	23,000 square ft	Samples: 5 point composite Frequency: Every 500 square ft Composite Action Limit: 0.20 mg/kg Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)
Area D Slab (south half)	Concrete	23,000 square ft	None (not regulated under TSCA) *Unless northern half of slab indicates additional sampling necessary.	None (not regulated under TSCA)	None (not regulated under TSCA)

Attachment 1
Sample Summary Table
PCB Risk-Based Remedial Action Plan
72-78 Stone Place, 99R and 101R Washington Street
Melrose, Massachusetts

Location	Media	Estimated Quantity	Pre-Remedial Characterization	Disposal Characterization	Post-Remediation Confirmatory Sampling
Soil below Area D Slab	Soil	Up to 46,000 square feet	None	(Post-remediation confirmatory sampling is sufficient)	Samples: 5 point composite (0-6") Frequency: Every 400 square ft in greater than 1 mg/kg impacted slab areas only Project Action Limit: 0.20 mg/kg Cleanup Goal: ≤ 1 mg/kg
Culvert					
Culvert contents	Solids	5,390 square feet	Samples: 5 point composite Frequency: Every 400 square ft (1-ft intervals) Project Action Limit: 0.20 mg/kg Cleanup Goal: ≤ 1 mg/kg	(Pre-remedial sampling is sufficient)	(All material removed - see wall and floor sampling below)
Pooled water inside culvert	Liquid	To be determined	Samples: grab (from fractionation tank) Frequency: 2 per 20,000 gallons (1 upper/ 1 lower) Project Action Limit: 0.5 ug/L Cleanup Goal: 0.5 ug/L	(Pre-remedial sampling is sufficient)	(Pre-remedial sampling is sufficient)

Attachment 1
Sample Summary Table
PCB Risk-Based Remedial Action Plan
72-78 Stone Place, 99R and 101R Washington Street
Melrose, Massachusetts

Location	Media	Estimated Quantity	Pre-Remedial Characterization	Disposal Characterization	Post-Remediation Confirmatory Sampling
Culvert walls/ floors	Masonry/ Concrete	4,620/ 5,390 square feet	None	(Post-remediation confirmatory sampling is sufficient)	Samples: 5 point composite Frequency: Every 400 square ft Project Action Limit: 0.20 mg/kg Cleanup Goal: ≤ 1 mg/kg
Underlying soil	Soil	8 soil borings	None	(Post-remediation confirmatory sampling is sufficient)	Samples: discrete grab (0-6" below floor) Frequency: Every 45 ft along culvert (8 total) Project Action Limit: 1 mg/kg Cleanup Goal: ≤ 1 mg/kg
Groundwater	Liquid	8 monitoring wells	None	(Post-remediation confirmatory sampling is sufficient)	Samples: groundwater grab Frequency: 1 per monitoring well Project Action Limit: 5 ug/L* Cleanup Goal: 5 ug/L* (*MCP GW-2 used)

General Note: Sample locations will be biased toward staining or discoloration where identified.